

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA

IN THE MATTER OF THE SEARCH OF  
INFORMATION ASSOCIATED WITH THE  
CELLULAR DEVICE ASSIGNED CALL  
NUMBER (540) 761-2990, WITH  
INTERNATIONAL MOBILE SUBSCRIBER  
IDENTITY NUMBER 310240310953112,  
THAT IS STORED AT PREMISES  
CONTROLLED BY T-MOBILE

Case No. 7:23mj27

**Filed Under Seal**

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Scott M. Long, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a search warrant for information associated with a certain cellular telephone assigned call number (540) 761-2990, with International Mobile Subscriber Identity 310240310953112 (“the SUBJECT PHONE”), that is stored at premises controlled by T-Mobile, a wireless telephone service provider headquartered at 4 Sylvan Way, Parsippany, NJ 07054. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. § 2703(c)(1)(A) to require T-Mobile to disclose to the government copies of the information further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review the information to locate items described in Section II of Attachment B.

2. I am a Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”) and have been so employed since 2002. I am currently assigned to the FBI Richmond, Virginia, Field Office, Roanoke Resident Agency. As part of my duties as an FBI SA, I have investigated criminal

violations relating to transnational organized crime, complex financial crime and securities fraud, civil rights, human trafficking, violent gangs, drugs, and international terrorism. I have received training and gained experience in: conducting investigations, interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, computer crimes, computer evidence identification, child pornography identification, computer evidence seizure and processing, and various other criminal laws and procedures.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S. Code § 2113 have been committed by Michael A. McCoy. There is also probable cause to search the information described in Attachment A for evidence of these crimes as further described in Attachment B.

#### **PROBABLE CAUSE**

5. On October 26, 2022, the FBI received a call regarding a bank robbery that had occurred at a Truist Bank branch in Roanoke, VA, which is located within the Western District of Virginia. The FBI responded to the scene and spoke with officers from the Roanoke City Police Department, who were already present. According to the officers and surveillance footage, at approximately 9:20 a.m., a Black man entered the Truist Bank at 2230 Melrose Avenue, Roanoke, VA. The man was wearing an orange beanie, glasses, a blue surgical mask, a black coat with a hoodie underneath, and dark pants and had with him a gray Wells Fargo bag. The man approached the window and handed a teller a note. The note demanded at least \$5,000 in cash, and it instructed

the teller not to hit any alarms or to add any dye packs. The teller took money from the top drawer and put it into a bag. The man then moved to another teller, who did the same. The man displayed a firearm at one point, and after receiving the bag of cash he left the building. The total amount of cash he received was \$6,485.

6. On October 28, 2022, at approximately 9:35 a.m., a Black man wearing an orange or tan beanie, glasses, a blue surgical mask, a black coat with a hoodie underneath, and gray and black pants and carrying a purple bag with writing entered the Truist Bank at 112 McClanahan Street SW, Roanoke VA. The man approached the teller and presented a handwritten note requesting cash from the teller. The teller provided an amount of cash that investigators later determined to be \$5,969. The man then put the cash in a purple bag that he brought with him, retrieved the note, and left the bank.

7. On November 10, 2022, at approximately 9:14 am, a Black man wearing a dark coat, clear eyeglasses, a dark skullcap hat, dark gloves, and a COVID-19 face mask entered Old Point National Bank, located at 11751 Jefferson Ave, Newport News, VA 23601. The man handed the teller a handwritten note instructing that if she remained silent and calm she would not get shot. The man also instructed the teller not to use any dye packs or trigger any alarms. The man held a bag in one hand and pointed a black handgun at the teller. The teller put \$4,472 in the man's bag and included a GPS tracker in the bag. The man departed the bank with the bag of money. The Newport News Police Department then used live GPS tracker updates to locate the man. The Newport News police located the man inside a Jeep Cherokee that had been rented from Enterprise Rent-A-Car and determined his identity to be Michael Anthony McCoy. McCoy was taken into custody and remains in the custody of the Newport News Police Department.

8. On November 10, 2022, the FBI received a tip from a person with the initials "A.P." in response to an FBI News Release seeking information regarding the two Truist robberies. A.P. identified the robber as Michael McCoy and said that McCoy drove a tinted black Chrysler 300, that he used to work at U.S. Food Services, and that he had an apartment in the vicinity of Melrose Ave in Roanoke, Virginia. The next day when contacted by law enforcement, A.P. provided McCoy's phone number as the SUBJECT PHONE.

9. On November 11, 2022, an FBI Task Force Officer interviewed an individual whose initials are "D.D." D.D. stated that McCoy came to her on October 26, 2022, shortly after 11:00 a.m. and stated he had "got him one." When D.D. asked McCoy what he had meant, he stated, "a bank." McCoy was driving a black Chrysler 300 that D.D. knew McCoy to own. A DMV query shows a Michael Anthony McCoy as the registered owner of a black 2013 Chrysler 300 with a registered address of 4102 Virginia Ave NW, Apt 18, Roanoke, VA, 24017. D.D. also provided McCoy's phone number as the SUBJECT PHONE.

10. On November 13, 2022, the FBI and the Roanoke City Police executed a state-authorized search warrant at 4102 Virginia Ave NW, Apt 18, Roanoke, VA, 24017. Items seized included a gray Wells Fargo bag matching the one used by the man in the October 26 bank robbery, a purple bag matching the bag used by the man who committed the October 28 robbery, multiple orange hats similar to the one worn by the man who committed the October 26 robbery and possibly matching the one worn by the man who committed the October 28 robbery, and gray and black pants matching those worn by the man who committed the October 28 robbery.

11. At the time of McCoy's arrest, a piece of paper was located on McCoy's person that appeared to be a handwritten list of various login IDs and passwords with McCoy's name included as part of several of the login IDs. Included in the list was a section titled "Boost Mobile"



and which listed the SUBJECT PHONE, a pin number, and a second phone number identified by the words "CUST SERV" with "FOR PMT" written underneath. Additionally at the top of the page were the words "US FOODS" and underneath that "Workday login," followed by what appear to be a username, password, and badge number.

12. Subscriber information obtained from T-Mobile for the SUBJECT PHONE lists the account billing address as Darrell Graves, 2016 Mercer Ave NW, Roanoke, VA, 24017. A review of law enforcement databases did not match a Darrell Graves to that address. Subscriber information identified the type of account as a Boost Mobile account.

13. A review of the Jeep Cherokee rental records identified McCoy as the renter and the SUBJECT PHONE as his contact number.

14. In my training and experience, individuals that commit crimes typically carry a cell phone on their person or within a vehicle while they are traveling to and from the place the incident is to occur.

15. In my training and experience, I have learned that T-Mobile is a company that provides cellular telephone access to the general public. I also know that providers of cellular telephone service have technical capabilities that allow them to collect and generate information about the locations of the cellular telephones to which they provide service, including cell-site data, also known as "tower/face information" or "cell tower/sector records." Cell-site data identifies the "cell towers" (i.e., antenna towers covering specific geographic areas) that received a radio signal from the cellular telephone and, in some cases, the "sector" (i.e., faces of the towers) to which the telephone connected. These towers are often a half-mile or more apart, even in urban areas, and can be 10 or more miles apart in rural areas. Furthermore, the tower closest to a wireless device does not necessarily serve every call made to or from that device. Accordingly, cell-site

data provides an approximate location of the cellular telephone but is typically less precise than other types of location information, such as E-911 Phase II data or Global Positioning Device (“GPS”) data.

16. Based on my training and experience, I know that T-Mobile can collect cell-site data about the SUBJECT PHONE. I also know that wireless providers such as T-Mobile typically collect and retain cell-site data pertaining to cellular phones to which they provide service in their normal course of business in order to use this information for various business-related purposes.

17. Based on my training and experience, I know that wireless providers such as T-Mobile typically collect and retain information about their subscribers in their normal course of business. This information can include basic personal information about the subscriber, such as name and address, and the method(s) of payment (such as credit card account number) provided by the subscriber to pay for wireless telephone service. I also know that wireless providers such as T-Mobile typically collect and retain information about their subscribers’ use of the wireless service, such as records about calls or other communications sent or received by a particular phone and other transactional records, in their normal course of business. In my training and experience, this information may constitute evidence of the crimes under investigation because the information can be used to identify the SUBJECT PHONE’s user or users and may assist in the identification of co-conspirators and/or victims.


18. Based on my training and experience, I know that T-Mobile also collects per-call measurement data, which T-Mobile also refers to as timing advance data. Timing advance data estimates the approximate distance of the cellular device from a cellular tower based on the speed with which signals travel between the device and the tower. This information can be used to estimate an approximate location range that is more precise than typical cell-site data.

**AUTHORIZATION REQUEST**

19. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to 18 U.S.C. § 2703(c) and Federal Rule of Criminal Procedure 41.

20. I further request that the Court direct T-Mobile to disclose to the government any information described in Section I of Attachment B that is within its possession, custody, or control. Because the warrant will be served on T-Mobile, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

Respectfully submitted,

  
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Scott M. Long  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me on March 7, 2023

*Robert S. Ballou*  
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Honorable Robert S. Ballou  
UNITED STATES MAGISTRATE JUDGE